

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

ENERGY XXI LTD., et al,

DEBTOR.

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**CASE NO. 16-31928
(Chapter 11)**

**Jointly Administered
Judge David R. Jones**

**OFFICIAL COMMITTEE OF EQUITY SECURITY
HOLDERS' EMERGENCY MOTION TO COMPEL DOCUMENT
PRODUCTION FROM BDO USA, LLP**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

IF YOU OBJECT TO THE REQUESTED RELIEF, A RESPONSE SHOULD BE FILED IMMEDIATELY. THE MOTION WILL BE SET FOR A HEARING ON OCTOBER 18, 2016 AT 9:00 A.M.

**TO THE HONORABLE DAVID JONES,
UNITED STATES CHIEF BANKRUPTCY JUDGE**

COMES NOW the Official Committee of Equity Security Holders, ("Equity Committee") and respectfully files this Motion to Compel Production of Documents from BDO USA LLP ("Motion to Compel").

In support of the Motion to Compel, the Equity Committee respectfully states as follows:

Factual Background

1. On September 26, 2016, the Equity Committee served a subpoena duces tecum on BDO USA LLP with a copy of the order related to the discovery in this matter found at Document No. 861. *See, Exhibit A.*

2. BDO responded objecting to the discovery and claiming an accountant-client privilege under the Texas Occupations Code Section 901.457 which prevents production without the Debtors' agreement. *See, Exhibit B.*

3. Counsel for the Equity Committee and BDO have conferred and have not been able, as of this date, to reach an agreement on the production of the records. The Equity Committee has not received a response to its proposal to limit an initial review of documents to an electronic search subject to specific search terms prior to the filing of this motion.

4. The Equity Committee will continue to work with BDO on trying to reach an agreement, but files this motion now so that parties have notice prior to the October 18, 2016 hearing. A status conference which includes discovery issues is scheduled for October 18, 2016.

5. BDO was the auditor for Energy XXI and is retained as an estate professional as its auditor to audit the consolidated financial statements including operations, stockholders' equity (deficit) and cash flows. *See, Doc. No. 404 generally and 404, p. 15.* In the application to employ BDO, the Debtors acknowledged that BDO was retained to provide Energy XXI with: an Integrated Audit of Consolidated Financial Statements and Internal Control Over Financial Report of the Company; quarterly reviews; services associated with SEC reporting; performing an Employee Benefit Plan Audit; and, services related to bankruptcy accounting matters. *See, Doc. No. 237, p 5-6.*

6. Energy XXI has retained BDO as its certifying accountant since December 1, 2014 as reported in its Form 8k dated December 1, 2014.

7. The Equity Committee and creditors have identified inconsistencies in the financial records, testimony and pleadings filed by the Debtors, including but not limited to the repurchased bonds, employee stock purchase plan, intercompany claims, asset values, reporting of reserves, number of shareholders, etc. which all relate to the potential objections to the confirmation of the proposed Plan.

8. The BDO documents are also highly relevant for the factual investigation necessary in determining what claims may exist against various parties which the Debtors propose to release in the Plan given the inconsistencies in other discovery productions which has been identified, including but not limited to: i) any potential shareholder derivative claims; ii) whether the repurchased bonds were deemed cancelled or extinguished by the Debtors; iii) whether the handling of the ESPP gives rise to claims which the Debtors propose to release; iv) whether the Disclosure Statement and Plan are consistent with the financial records provided to BDO; v) whether there were any accounting irregularities which would give rise to claims; etc.

Law and Argument

9. There is no accountant-client privilege that allows for withholding the production of the records. As Judge Pitman of the United States District Court for the Western District of Texas recently opined:

In Texas, accountant-client communications are confidential, but not privileged. See *In re Patel*, 218 S.W.3d 911, 920 n.6 (Tex. App.—Corpus Christi 2007, no pet.). Moreover, even if [BDO] were correct in its reading of Texas law, this is a federal question case and, accordingly, federal privilege law governs. See *Doe v. City of San Antonio*, 2014 U.S. Dist. LEXIS 161434, 2014 WL 6390890, at *1. There is no federal accountant-client privilege. e.g., *Couch v. U.S.*, 409 U.S. 322, 335, 93 S. Ct. 611, 34 L. Ed. 2d 548 (1973); *DAC Surgical Partners P.A. v. United Healthcare Servs., Inc.*, No. 4:11-CV-1355, 2014 U.S. Dist. LEXIS 18768, 2014 WL 585750, at *4 (S.D. Tex. Feb. 14, 2014).

Cantu v. TitleMax, Inc., 2015 U.S. Dist. LEXIS 139406, *15 (W.D. Tex. Oct. 9, 2015).

10. Rule 501 of the Federal Rules of Evidence provides that federal common law governs privileges in cases where federal law supplies the rule of decision, while state privilege law governs in civil cases involving "a claim or defense for which state law supplies the rule of decision." Fed.R.Evid. 501.

11. While the court may look to state law for guidance in applying the requirements of Section 1129, the confirmation of the Plan is a core Bankruptcy matter and governed by federal law. Accordingly, federal law on privileges applies to the discovery propounded on BDO.

PRAYER

The Equity Committee requests that the Court grant the Motion to Compel and require BDO to produce the requested records by no later than October 21, 2016 and further prays for such other relief as may be fair and equitable or appropriate.

DATED: October 16, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2016, a true and correct copy of the foregoing Equity Committee's Motion to Compel was served by the Court's ECF notification system to the parties listed below at the email addresses listed below and a copy was emailed to BDO's counsel Eli Burris at eli.burris@dlapiper.com

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